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December 12, 2017

By Electronic Mail

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, *et seq.*, I am requesting copies of the following records:

1. All records discussing, describing, or referring to compliance with Title II of the Clean Air Act, 42 U.S.C. § 7521, *et seq.*, by H&S Performance, LLC and/or H&S Motorsports (“H&S”), including, but not limited to, any and all records provided to the U.S. Environmental Protection Agency (“EPA”) by H&S, correspondence between EPA and H&S, or other contacts between EPA and H&S regarding H&S’s products’ compliance or noncompliance with Title II of the Clean Air Act. This should include all records, as described above, dating from 2011 to the present.
2. All records discussing, describing, or referring to compliance or noncompliance with Title II of the Clean Air Act by current or former H&S officers or employees, including but not limited to, Casey Shirts, Bentley Hugie, and Tom Wood (“H&S personnel”). These records would include, but not be limited to, any and all records provided to EPA by or regarding current or former H&S personnel, correspondence between EPA and H&S personnel, correspondence between EPA and any other person regarding H&S personnel, or other contacts between EPA and H&S personnel regarding compliance or noncompliance with Title II of the Clean Air Act. This should include all records, as described above, dating from 2011 to the present.
3. All records, including, but not limited to, correspondence between EPA and the California Air Regulatory Board (“CARB”) discussing, describing, or referring to H&S’ and/or H&S personnel’s compliance or noncompliance with Title II of the Clean Air Act and/or California Vehicle Code §§ 27156 or 38391 and related California

regulations. This should include all records, as described above, dating from 2011 to the present.

4. All records discussing, describing, or referring to EZ Lynk's compliance or noncompliance with Title II of the Clean Air Act, including, but not limited to, any and all records provided to EPA by EZ Lynk, correspondence between EPA and EZ Lynk, or other contacts between EPA and EZ Lynk regarding its products' compliance or noncompliance with Title II of the Clean Air Act. This should include all records, as described above, dating from 2011 to the present.
5. All records discussing, describing, or referring to compliance or noncompliance with Title II of the Clean Air Act by current or former EZ Lynk officers or employees, including but not limited to, Daniel Shirts, Payton Hugie, Tom Wood, Bradley Ginst, Kory Willis, and Jeremy Pierce ("EZ Lynk personnel"). These records would include, but not be limited to, any and all records provided to EPA by or regarding current or former EZ Lynk personnel, correspondence between EPA and EZ Lynk personnel, correspondence between EPA and any other person regarding EZ Lynk personnel, or other contacts between EPA and EZ Lynk personnel regarding compliance or noncompliance with Title II of the Clean Air Act. This should include all records, as described above, dating from 2011 to the present.
6. All records, including, but not limited to, correspondence between EPA and CARB discussing, describing, or referring to EZ Lynk's compliance or noncompliance with Title II of the Clean Air Act and/or California Vehicle Code §§ 27156 or 38391 and related California regulations. This should include all records, as described above, dating from 2011 to the present.

For purposes of this request, "records" means documents, information, memoranda, letters, information requests, reports, drafts, electronic mail, testing data, analyses, meeting sign-in sheets, presentations, handwritten or typed notes, facsimile transmissions, calendars, agendas, transcripts or recordings of meetings (including audio or video), and all other types of records in the possession, custody, or control of EPA or contractors working for EPA.

For all records responsive to these requests that are not produced based on an asserted exemption from disclosure, please prepare a *Vaughn* index or other exemption log describing, at a minimum: (1) the type of record withheld, (2) the date of the record withheld, (3) the subject of the record, (4) the identity of the author and recipients of the record, and (5) the basis upon which EPA is withholding the record. To the extent any responsive documents are withheld based upon a claim of privilege or other exemption from disclosure, please produce redacted copies of all non-privileged or non-exempt factual material contained within such documents.

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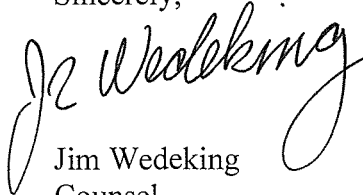
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As required by law, please provide the records requested herein within twenty (20) business days of receipt. 5 U.S.C. § 552(a)(6)(A)(i). If it appears that it may not be possible to provide all of the records by the statutorily-mandated deadline, please provide the responsive records that are available as of the deadline (*i.e.*, do not withhold responsive records past the deadline while searching for or reviewing additional records), and please contact me promptly regarding any scheduling issues.

I confirm in advance my willingness to pay for all reasonable costs associated with searching for and copying these records. However, should these costs exceed \$500, I ask that you contact me prior to proceeding.

Thank you for your prompt attention to this request. Please direct any inquiries, notices, or determinations to me at (202) 736-8281 or jwedeking@sidley.com.

Sincerely,



Jim Wedeking
Counsel

JW: